

1 IGNACIO E. SALCEDA, State Bar No. 164017  
DALE BISH, State Bar No. 235390  
2 REBECCA L. EPSTEIN, State Bar No. 168226  
WILSON SONSINI GOODRICH & ROSATI  
3 Professional Corporation  
650 Page Mill Road  
4 Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
5 Facsimile: (650) 565-5100  
Email: isalceda@wsgr.com  
6 dbish@wsgr.com  
bepstein@wsgr.com  
7

8 *Attorneys for Defendants QuantumScape*  
*Corporation, Jagdeep Singh, Timothy*  
9 *Holme, and Kevin Hettrich*

10 [Additional Counsel on Signature Block]

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13

14 IN RE QUANTUMSCAPE SECURITIES  
15 CLASS ACTION LITIGATION

) CASE NO.: 3:21-CV-00058-WHO  
)  
) **STIPULATION AND [PROPOSED]**  
16 **ORDER TO STAY ALL**  
) **PROCEEDINGS AND VACATE**  
17 **DATES IN SCHEDULING ORDERS**  
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28 STIPULATION AND [PROPOSED] ORDER  
TO STAY PROCEEDINGS AND VACATE  
SCHEDULING ORDERS  
3:21-CV-00058-WHO

1 Defendants QuantumScape Corporation, Jagdeep Singh, Kevin Hettrich, and Timothy  
2 Holme (“Defendants”) and Lead Plaintiff Frank Fish, named Plaintiff Mary Cranny, and named  
3 Plaintiff Kathy Stark (“Plaintiffs”) (collectively with Defendants, the “Parties”) stipulate and agree  
4 as follows:

5 WHEREAS, on June 8, 2023, the Court entered the Parties’ stipulated case schedule (the  
6 “Case Schedule Order”), setting various deadlines for the completion of discovery, dispositive  
7 motion practice, and setting a trial date of February 24, 2025 (ECF No. 190);

8 WHEREAS, on March 11, 2024, the Court entered the Parties’ stipulated extension of  
9 certain expert discovery deadlines (ECF No. 209), leaving the remaining deadlines in the Case  
10 Schedule Order unaffected;

11 WHEREAS, the Parties reached an agreement in principle to settle the litigation, and  
12 subsequently entered a Stipulation of Settlement, with related exhibits;

13 WHEREAS, on June 11, 2024, Plaintiffs filed their Motion for Preliminary Approval of  
14 Proposed Class Action Settlement (the “Preliminary Approval Motion”);

15 WHEREAS, the Parties agree that to conserve judicial and the Parties’ resources, all  
16 deadlines should be vacated;

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the Parties  
18 through their undersigned counsel, that:

- 19 1. All deadlines in this action are vacated other than in connection with the Court’s  
20 review of the proposed settlement, including the Preliminary Approval Motion.

21 **IT IS SO STIPULATED.**

22 DATED: June 11, 2024

LEVI & KORSINSKY, LLP

24 By: /s/ Nicholas I. Porritt

25 Nicholas I. Porritt

26 Adam M. Apton (SBN 316506)  
27 1160 Battery Street East  
Suite 100 - #3425  
San Francisco, CA 94111  
Tel: 415-373-1671

28 STIPULATION AND ~~PROPOSED~~ ORDER  
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aapton@zlk.com

Nicholas I. Porritt (admitted *Pro Hac Vice*)  
33 Whitehall Street, 17<sup>th</sup> Floor  
New York, NY 10004  
Tel: 212-363-7500  
nporritt@zlk.com

Shannon L. Hopkins (admitted *Pro Hac Vice*)  
Gregory M. Potrepka (admitted *Pro Hac Vice*)  
1111 Summer Street, Suite 403  
Stamford, CT 06905  
Tel: (203) 992-4523  
Email: shopkins@zlk.com  
Email: gpotrepka@zlk.com

*Attorneys for the Lead and Named Plaintiffs  
and the Class*

DATED: June 11, 2024

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Ignacio E. Salceda  
Ignacio E. Salceda


Ignacio E. Salceda (SBN 164017)  
Dale Bish (SBN 235390)  
Rebecca L. Epstein (SBN 168226)  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
Facsimile: (650) 565-5100  
isalceda@wsgr.com  
dbish@wsgr.com  
bepstein@wsgr.com

*Attorneys for Defendants QuantumScape  
Corporation, Jagdeep Singh, Timothy  
Holme, and Kevin Hettrich*

**[PROPOSED] ORDER**

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: June 12, 2024

  
\_\_\_\_\_  
HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE

**ATTESTATION**

I, Ignacio E. Salceda, am the ECF User whose identification and password are being used to file the **STIPULATION AND [PROPOSED] ORDER TO STAY ALL PROCEEDINGS AND VACATE DATES IN SCHEDULING ORDERS**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 11, 2024

By: /s/ Ignacio E. Salceda  
Ignacio E. Salceda